

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF WISCONSIN

In Re:  
KOREY A CARLSEN  
Debtor(s).

Chapter 13 Bankruptcy  
Case No. 10-32153-MDM

**TRUSTEE'S OBJECTION AND NOTICE OF OBJECTION  
TO DEBTORS' PROPOSED CHAPTER 13 PLAN**

Mary B. Grossman, Standing Chapter 13 Trustee has filed papers with the court objecting to the proposed plan filed by the debtor.

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

The Trustee, Mary B. Grossman, hereby objects to the proposed Chapter 13 Plan in this bankruptcy proceeding for the following reason(s):

- ☐ The proposed plan is not substantiated by a budget.
- ☒ This proposed plan does not provide for a feasible plan.
- ☐ The plan does not provide for the submission of all or such portion of future earnings or other future income of the debtor to the supervision and control of the Trustee as is necessary for the execution of the Plan. 11 U.S.C. §1322(a)(1).
- ☐ The plan does not provide for the full payment, in deferred cash payments, of all claims entitled to priority under 11 U.S.C. §507. 11 U.S.C. §1322(a)(2).
- ☐ The plan does not provide for the same treatment for each claim within a particular class. 11 U.S.C. §1322(a)(3).
- ☒ The plan has not been proposed in good faith. 11 U.S.C. §1325(a)(3).
- ☐ The debtor will be unable to make all the payments under the proposed plan or to otherwise comply with the terms of the proposed plan. 11 U.S.C. §1325(a)(6).
- ☒ Failure to pay all disposable income as required by §1325(b).
- ☐ Failure to properly serve post-confirmation plan modification as required by Rule 3015(g).
- ☒ Other: The above-median Debtor has Disposable Monthly Income of \$722.04 per B22C which is sufficient to pay 100% to unsecured claims. The Debtor's income has increased from \$3,897 per month to \$5,055 per month and Debtor has increased his voluntary contributions to retirement plans from \$0 to \$303.33 at the expense of unsecured creditors.

The Trustee respectfully requests that a hearing be set in this matter.

Dated at Milwaukee, Wisconsin, this 29<sup>th</sup> day of June 2015

OFFICE OF CHAPTER 13 TRUSTEE

/s/ \_\_\_\_\_  
Mary B. Grossman, Chapter 13 Trustee  
Robert W. Stack, Staff Attorney  
Christopher D. Schimke, Staff Attorney  
Sandra M. Baner, Staff Attorney

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Chapter 13 Bankruptcy

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Debtor

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**CERTIFICATE OF SERVICE – TRUSTEE’S OBJECTION AND NOTICE OF OBJECTION  
TO DEBTORS’ PROPOSED CHAPTER 13 PLAN**

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The undersigned being first duly sworn on oath, deposes and says that on this date she electronically or conventionally served a copy of the attached Notice of Objection to Debtor’s proposed Chapter 13 Plan in accordance with FRBP and FRCP (5)(b)(2)(D) .

Dated: June 29, 2015

/s/ \_\_\_\_\_  
Tongula Washington  
Administrative Assistant to  
Mary B. Grossman, Chapter 13 Trustee  
P.O. Box 510920  
Milwaukee, WI 53203  
(414) 271-3943

CONVENTIONAL MAIL RECIPIENTS:

Debtor(s):

KOREY A CARLSEN  
7852 15TH AVENUE  
KENOSHA, WI 53143

ELECTRONIC MAIL RECIPIENTS:

RIZZO & DIERSEN, S.C.  
OFFICE OF THE US TRUSTEE